

1 KAMALA D. HARRIS  
Attorney General of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 ROSAILDA PEREZ  
Deputy Attorney General  
4 State Bar No. 284646  
455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-1618  
6 Facsimile: (415) 703-5480  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2013-883

11 **JENNIFER L. MOORE**  
12 **aka JENNIFER LYNN MOORE**  
13 **aka JENNIFER MOORE**  
1095 E. Avocado Crest Road  
14 La Habra Heights, CA 90631

**A C C U S A T I O N**

15 **Registered Nurse License No. 436822**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing (Board),  
21 Department of Consumer Affairs.

22 2. On or about March 31, 1989, the Board issued Registered Nurse License Number  
23 436822 to Jennifer L. Moore, aka Jennifer Lynn Moore, aka Jennifer Moore (Respondent). The  
24 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on September 30, 2014, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following  
28 laws. All section references are to the Business and Professions Code (Code) unless otherwise

1 indicated.

2 4. Code section 2750 provides, in pertinent part, that the Board may discipline any  
3 licensee, including a licensee holding a temporary or an inactive license, for any reason provided  
4 in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
6 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
7 to render a decision imposing discipline on the license.

8 STATUTORY PROVISIONS

9 6. Code section 2761 states:

10 "The board may take disciplinary action against a certified or licensed nurse or deny an  
11 application for a certificate or license for any of the following:

12 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

13 "..."

14 "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action  
15 against a health care professional license or certificate by another state or territory of the United  
16 States, by any other government agency, or by another California health care professional  
17 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that  
18 action.

19 "..."

20 COST RECOVERY

21 7. Code section 125.3 provides, in pertinent part, that the Board may request the  
22 administrative law judge to direct a licentiate found to have committed a violation or violations of  
23 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
24 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
25 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
26 included in a stipulated settlement.

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1 CAUSE FOR DISCIPLINE

2 (Unprofessional Conduct-Out of State Discipline)

3 8. Respondent is subject to disciplinary action under Code section 2761, subdivision  
4 (a)(4), in that on or about February 9, 2012, in a disciplinary action before the Nebraska  
5 Department of Health and Human Services Division of Public Health, in the matter of Registered  
6 Nursing License No. 47260, Respondent's license was suspended for thirty days for practicing the  
7 profession "in a pattern of incompetent or negligent conduct" and for unprofessional conduct.  
8 The disciplinary action was based on Respondent's actions on three occasions between and on or  
9 about April 24, 2010 and November 3, 2011. The circumstances are as follows:

10 a. On or about April 24, 2010, Respondent failed to document that she administered  
11 medication to two residents and the justification for the administration.

12 b. On or about October 11, 2011, Respondent incorrectly documented that she had  
13 administered medication six times when, in fact, the medication had not yet been delivered to the  
14 facility by the pharmacy.

15 c. On or about November 3, 2011, Respondent changed the manner in which a  
16 medication was administered without consulting the physician.

17 PRAYER

18 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
19 and that following the hearing, the Board of Registered Nursing issue a decision:

20 1. Revoking or suspending Registered Nurse License Number 436822, issued to  
21 Jennifer L. Moore, aka Jennifer Lynn Moore, aka Jennifer Moore;

22 2. Ordering Jennifer L. Moore, aka Jennifer Lynn Moore, aka Jennifer Moore, to pay the  
23 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this  
24 case, pursuant to Business and Professions Code section 125.3;

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1           3.    Taking such other and further action as deemed necessary and proper.

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3   DATED: APRIL 8, 2013

*Louise R. Bailey*  
LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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